



Jeanne M. Christensen

jchristensen@wigdorlaw.com

August 28, 2024

VIA ECF

The Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007-1312

Re: Anisha Mehta v. DLP Piper LLP; Case No.: 1:23-cv-04757 (AT) (RFT)

Dear Judge Torres,

We represent Plaintiff Anisha Mehta in the above-captioned matter against Defendant DLA Piper LLP (“DLA Piper”).

On June 2, 2024, Your Honor So Ordered the Summary Judgment Briefing Schedule in the table below (Dkt. No. 96). The Parties agreed internally to extend Defendant’s deadline to submit the Statement of Material Facts to Plaintiff from July 31, 2024 to August 7, 2024, and to provide Plaintiff a corresponding additional week to provide her response with a revised deadline of September 4, 2024. The Parties did not notify the Court because no further deadlines were impacted.

Plaintiff respectfully requests that the deadline for Plaintiff’s response to DLA Piper’s Statement of Material Facts provided to DLA Piper be extended from September 4, 2024 to September 6, 2024. Defendant DLA Piper has consented to this request with the understanding that Defendant would also be permitted an additional two business days to file Defendant’s pre-motion letter, and that the motion briefing schedule would be adjusted accordingly. Please see the table below for the proposed updated schedule.

Briefing	Deadline	Updated Deadline
DLA Piper’s Rule 56.1 Statement of Material Facts sent to Plaintiff	July 31, 2024 August 7, 2024	August 7, 2024
Plaintiff’s response to DLA Piper’s Statement of Material Facts provided to DLA Piper	August 28, 2024 September 4, 2024	September 6, 2024
DLA Piper’s pre-motion letter filed with the Court	September 13, 2024	September 17, 2024



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Plaintiff's opposition to pre-motion letter filed with the Court	September 20, 2024	September 24, 2024
Motion for Summary Judgment	October 11, 2024	October 15, 2024
Opposition to Motion for Summary Judgment	November 1, 2024	November 5, 2024
Reply in Support of Motion for Summary Judgment	November 15, 2024	November 19, 2024

This is the Parties' first request regarding an extension of these deadlines.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeanne Christensen", with a long, flowing horizontal stroke extending to the right.

Jeanne M. Christensen